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Attorney for Defendant Christopher Fellini

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:20-cr-00212-MO

Plaintiff,

vs.

DEFENDANT'S UNOPPOSED MOTION
TO CONTINUE TRIAL DATE

CHRISTOPHER FELLINI,

Defendant.

UNOPPOSED MOTION

Defendant Christopher Fellini, by and through his counsel, John Robb, hereby moves for a continuance of the currently scheduled trial date. Undersigned counsel certifies that Mr. Fellini agrees with this request, understands the rights provided by the Speedy Trial Act, and waives those rights to the extent necessary for the granting of this motion in light of the reasons therefor, and that the government, by and through its counsel Gary Sussman, does not oppose this motion.

Mr. Fellini requests that the currently scheduled trial, now set for January 5, 2021, be continued to a date in April. This unopposed motion is made pursuant to 18 U.S.C. § 3161, the

Federal Rules of Criminal Procedure, and the Fifth and Sixth Amendments to the United States Constitution.

Defense counsel respectfully submits that, under the Speedy Trial Act, such a continuance is necessary because the failure to grant such a continuance would unduly prejudice defendant and would deny defense counsel adequate time to prepare for trial (taking into account the exercise of due diligence). Accordingly, the ends of justice served by granting such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C § 3161(h)(7)(A)-(B).

DATED: December 22, 2020

KEVIN SALI LLC

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